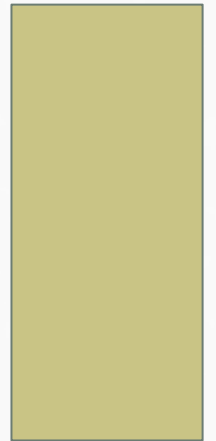


ESTABLISHING A RECORDS MANAGEMENT PROGRAM

**GEORGE DESPRES, NEW ENGLAND ARCHIVISTS
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ACTIVITY OUTLINE

- **Background Review and Context**
- **Learning the Institution**
 - **Typical Institution functions**
 - **Helpful Institution documents (Internal)**
- **Socializing RM and Working with Stakeholders**
 - **Questions to ask**
- **Creating Record Policy / Retention Schedule**
 - **Laws and regulations - Information resources**
 - **Sample retention schedule record category**
 - **Sample records lifecycle – Human Resources / Personnel**
- **Questions for Offsite Storage Vendors**
- **Electronic Records Management System Considerations**
- **Challenges to Successful Records Management**

DEFINITIONS

- **Records:** All documentary information, regardless of format, made or received in connection with an institution's activity and reflecting its functions, policies, decisions, procedures, and research. Examples: Meeting minutes, student transcripts, invoices, reports, memoranda, deeds of gift, licensing agreements, and curricula listings.
- **Records Management (RM):** The responsible and consistent management of an institution's records according to a retention policy that determines how long different records are kept, based on outside laws and regulations and legitimate internal needs.

TYPICAL RECORDS PROGRAM GOALS

- **Align stakeholder and collaborator support for RM.**
 - **Leadership, Legal, Security, IT, Internal Communications.**
- **Achieve employee awareness & basic understanding of records & responsibilities.**
- **Create and release retention policy.**
- **Establish sustainable offsite storage, scanning & destruction arrangements for paper records.**
- **Achieve litigation and eDiscovery preparedness.**
- **Establish forms management program, reducing paper use & streamlining workflows.**
- **Acquire, pilot, & expand electronic records management system(s) (ERMS).**

SNAPSHOT: RECORDS RETENTION SCHEDULE

Environmental Health and Safety

Vendor contracts	7 years after contract term
Evacuation drill records	1 year
Air and water emissions measurements	2 years
Fire protection system records	5 years
Hazardous waste disposal manifests	3 years

Reference: Amherst College

RM SOLUTION COMPONENTS

Records Management and Compliance Committee / Liaisons
Record Retention Schedule / Communication

Scanning / Digitization Service

**Offsite Storage and Centralized
Destruction Services**

Forms Management
(green and efficient)

E-Records System (ERMS)
(COTS, open source, cloud,
analytics tool, auto-categorization,
predictive coding, or combination)

LEARN THE INSTITUTION - FUNCTIONS

- Board of Trustees, Office of the President/CEO
- Senior Executives (CIO, CFO, functional heads)
- Human Resources
- Finance
 - Procurement, Payroll, Treasurer
- Medical/nurse (“covered entity”) – outsourced?
- Facilities
- Security
- Information and IT
- Legal and Contracts
- Communications
- Sales, Customer Service
- **Consideration: How are functions “bundled” within your organization?**

LEARN THE INSTITUTION – DOCUMENTS THAT HELP

- **Bylaws, Charter**
- **Organization charts**
- **Policies and Procedures**
- **Audits and assessments of your institution**
- **Employee manuals**
- **Record system manuals**
- **Institution-wide budget and disclosure statements**
- **Forms**
- **Sample documents (contracts, information release authorizations, etc.)**
- **Institutional newsletters and monthly publications**
- **Annual reports**
- **Intranet / web site – service pages**

SOCIALIZE THE PROGRAM – QUESTIONS FOR STAKEHOLDERS

- Which records are most important to you?
- Paper vs. electronic records use?
- When do you destroy records?
- Paper records and forms that you'd like to have electronically?
- What electronic document / data systems are you using? What is your satisfaction with them?
- How far back (in years) do you reference documents?
- Where does your department hand off records to other departments, and vice versa? Who "owns" them?
- Information pain points?
- **Consideration: Navigate stakeholder busy seasons – e.g., Procurement at end of fiscal year = unreasonable time to introduce RM**

RETENTION SCHEDULE/POLICY, LAW, & REGULATION SOURCES - 1

- **Governmental e.g. Federal Register, Code of Federal Regulations (CFR)**
- **Federal Acquisition Regulations (if government-sponsored)**
- **State regulations (e.g. MA CMR; RI Gen. Laws; CT Gen. Statutes, etc.)**
- **Health Insurance Portability Act (HIPAA)**
- **Family Medical Leave Act (FMLA), OSHA**
- **IRS**
- **Statute of Limitations (SoL)**
- **Department of Labor (DoL)**
- **Title VII (employment discrimination), Title IX (sexual discrimination), ADEA (age discrimination)**
- **Union agreements**

RETENTION SCHEDULE/POLICY, LAW, & REGULATION SOURCES - 2

- Industry-specific regulations (e.g. Sarbanes Oxley)
- Industry regulators (Dept. of Education, SEC)
- Professional societies & their literature: ARMA, AIIM, Cohasset Associates, ICRM
- American Society of International Law (ASIL) Guide
- Sedona Guidelines and eDiscovery literature and case reports
- RM listserv: <http://lists.ufl.edu/archives/recmgmt-l.html>
- Books on the law in your industry – “quasi-paralegal”
- Your legal department and stakeholders
- **OTHER PUBLISHED RETENTION SCHEDULES! (as a structural blueprint only): NARA's General Records Schedules (GRS), published college schedules.**

RETENTION SCHEDULE – SAMPLE SERIES

01-008	Financial Records - Payment Records				
Retention Period	Authority	Vital?	Potential Archival Value?	Office of Record	Point of Contact
FY+7	<u>48 CFR;</u> <u>IRS</u>	No	No	Accounts Payable	Jane Doe

Description:

All records relating to and supporting the payment of an invoice. It is used to provide information to answer inquiries related to specific invoice payments, as a reference for vendor inquiries and to support audit activities.

Please see the [02-008](#) Documents List for sample record/document titles included in this record category.

FUNCTIONAL DOCUMENTS – THE HUMAN RESOURCES LIFECYCLE

- **Resume, cover letter, recommendation records**
- **Hiring documents (I-9, W-4, etc.)**
 - **Opt in/out for benefits, code of ethics sign off**
 - **Employment verification and authorization records**
- **Intellectual property waiver / nondisclosure agreement**
- **Orientation participation documents or modules**
- **Benefits records**
- **Performance reviews**
- **Disability accommodation records**
- **Dispute resolution records**
- **Promotion records**
- **Transfer records**
- **Retirement records**
- **Voluntary and involuntary termination records**
- **Recruitment records**

QUESTIONS TO ASK YOUR STORAGE VENDORS

- **Location? Nearby water or hazmat?**
- **Warehouse facility security and controls?**
- **Contingency Plan?**
- **Personal Info (PII) Written Information Security Plan (WISP) (e.g. MA CMR 200 17)**
- **Staff background checks and vetting?**
- **On-site video surveillance?**
- **Site visits/tours offered?**
- **Retrieval turnaround times?**
- **Batch and bulk reduced charge rates per box?**
- **Consideration: If you ever change storage vendors, there will be a retrieval charge from your former vendor, in order to get your boxes to the new vendor. So choose your vendor wisely!**

ELECTRONIC RECORDS MANAGEMENT SYSTEM (ERMS) CONSIDERATIONS

- **Cost**
- **Interoperability with existing systems, ease of deployment**
- **Available, ongoing IT support resources for the system**
- **Platform Options**
 - **Commercial software product**
 - **Open source product (need lots of IT support for this!)**
 - **Cloud service – public and/or private cloud**
 - **Cooperatives with other Institutions**
 - **Analytics software, Redaction software**
- **Mobile device delivery**
- **Security levels and controls**
- **Vertical market specialties (e.g. higher education, finance)**
- **Horizontal market specialties (e.g. accounts payable)**
- **Vendor acquisitions and strategic focus**
- **Interoperability bias (e.g. with Microsoft)**
- **Capabilities needed – sufficient vs. overkill**

CHALLENGES TO RM PROGRAMS

- **Volume, velocity, variety**
- **Document duplication**
- **Mismanaged legacy collections and practices**
- **Parallel repositories**
- **Storing with third party vendors (e.g. Google docs)**
- **Lack of context**
- **Culture, change management**
- **Mobile devices, social media, BYOD**
- **Blurry line between personal-business record ownership**
- **Digital obsolescence**

SCENARIOS

- **You inherit 150 boxes of interfiled records with different retention requirements. How would you handle this?**
- **Online forms are printed, signed, placed in interoffice mail and sent to service department (e.g. HR), then the paper copies are scanned. What's wrong here? How could you improve this process?**
- **To accommodate another function, your Facilities Vice President needs to vacate a building filled with 90 file cabinets of records ASAP. Your current scanning vendor cannot process this volume in a timely manner. How might you respond?**

OTHER INFORMATION RESOURCES

- **Choksy, Carol, "Domesticating Information":**
- **Kahn, Randolph, "Information Nation"**
- **Saffady, William., "Managing Electronic Records"**
- **RM Listserv:** <http://lists.ufl.edu/archives/recmgmt-1.html>
- **Sedona Guidelines:**
- **ARMA**
- **AIMM**
- **DOD 5015.2**
- **MOREq2**
- **Brandeis Records Guide:** <http://brandeis.libguides.com/URM>
- **General Records Schedule (U.S. Government, GRS)**
- **Forrester Market and Gartner Quadrant RM software surveys**
- **eDiscovery Resources:** <http://www.legaco.org/article/10-electronic-discovery-resources-para-legals>
- **Business Forms Management Association:** <http://www.bfma.org/>

SOFTWARE FOR RECORD REGULATION RESEARCH

- Zasio Versatile Retention: <http://www.zasio.com/software-ret-vr.asp>
- Retention Manager: <http://www.irch.com/products/retention-manager/>

Questions and Comments?

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www.brandeis.edu search: URM